

April 28, 2008

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12 St., SW  
Washington, DC 20554

Re: Broadcast Localism, MB Docket No. 04-233

Dear Ms. Dortch:

I am Station Director of WCAI-FM, a public radio service licensed to WGBH. Through three radio stations, WCAI-FM Woods Hole, WNAN-FM Nantucket, and WZAI-FM Brewster, WCAI provides NPR and local programming throughout the hard-to-reach communities of Cape Cod and the "Islands" (Martha's Vineyard and Nantucket.) I submit this letter in the above-captioned proceeding because reverting to the pre-1987 rule, which would require each broadcasting station to place its main studio in its community of license, would cripple WNAN-FM and WZAI-FM's ability to serve their listeners on the Cape and the Islands.

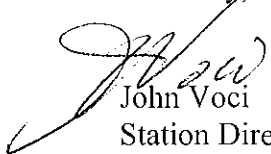
While the stations' transmitters are in their communities of license, pursuant to a waiver of the current main studio rule, WNAN-FM and WZAI-FM share a main studio with WCAI-FM in Woods Hole. Co-location of the main studio in Woods Hole allows listeners in Nantucket and Brewster to receive service, as the latter two communities' smaller populations are unable to economically support their own main studios. This economic flexibility also permits WNAN-FM and WZAI to provide deep and continuous coverage of issues particular to Brewster and Nantucket. Two field reporters are also dedicated to covering the Brewster/Upper Cape area for WZAI-FM. Similarly, WNAN-FM has a field reporter covering Nantucket, and one covering the Outer Cape. In addition, the stations' joint operations have allowed them to focus on in-depth investigative journalism on issues particular to their service area and on service area-wide public interest programming. In 1997, for example, WCAI-FM won the prestigious Alfred I. DuPont-Columbia University Award for a 20-part series called "Two Cape Cods: Hidden Poverty on the Cape and Islands." All of the stations participate in the "Sonic I.D." program, which airs short interviews and vignettes with Cape and Island residents throughout the broadcast day. These stories help develop a sense of community across the geographically fragmented service areas.



At the same time WNAN-FM and WZAI-FM initiate ongoing contact with the Nantucket and Brewster communities. WZAI-FM organizes public meetings twice a year in Brewster exclusively focused on how the station is serving the Brewster community, participates in Brewster's yearly Town Meeting, and maintains a toll-free telephone line between Brewster and WZAI allowing listeners to communicate with the station. For more than five years, WNAN has presented weekly on-air conversations with editors and writers from the town's newspaper, *The Inquirer and Mirror*, to discuss issues on island, and in recent months we have installed a T-1 line that facilitates higher quality broadcasting of Nantucket-based programs, such as our monthly "Bird News" series, as well as occasional remote broadcasts of our call-in program "The Point". In our eight years on the air, we have hosted more than a dozen community events on Nantucket alone, and we have partnered with respected community organizations there on lectures, town reading initiatives, and their much-loved annual wine and film festivals.

As noncommercial radio licensees, the three stations have been serving their communities of license with locally focused programming for many years. Jay Allison, the stations' founder, built the stations from the ground up, with the help of dozens of volunteers from the Cape and Islands region who identified a need for a strong local public radio service that served their entire community. Imposing a strict community-of-license main studio location requirement could deprive the Brewster and Nantucket communities of a broadcasting and community service they have come to depend on and enjoy.

Sincerely,



John Voci  
Station Director  
WCAI-FM

cc: Chairman Kevin J. Martin  
Commissioner Michael J. Copps  
Commissioner Jonathan S. Adelstein  
Commissioner Deborah Taylor Tate  
Commissioner Robert M. McDowell  
Krista Witanowski  
Rick Chessen  
Rudy Brioché  
Amy Blankenship  
Cristina Chou Pauzé

U.S. Senator Edward M. Kennedy  
U.S. Senator John F. Kerry  
U.S. Representative Edward J. Markey  
U.S. Representative William D. Delahunt